REMARKS

Applicants have studied the Office Action dated August 11, 2005. No new matter has been added. It is submitted that the application, is in condition for allowance, or alternatively in better form for appeal. Applicants have amended Claims 1-10 and 13-14, 16-17. By virtue of this amendment, claims 1-17 are pending. Reconsideration and further examination of the pending claims in view of the above amendments and the following remarks is respectfully requested. In the Office Action, the Examiner:

- Objected to claims 1, 9, and 10 due to various informalities;
- Rejected claims 1-10, 12, and 14-17 under 35 U.S.C. §103(a) as being unpatentable over Farnwald et al. (U.S. Patent No. 6,185,644) and Sakai et al. (U.S. Patent No. 6,005,869); and
- Rejected claims 11 and 13 under 35 U.S.C. 103(a) as being unpatentable over Sakai et al. (U.S. Patent No. 6,005,869) and Farnwald et al. (U.S. Patent No. 6,185,644) as applied to claims 9 and 10 above, and further in view of Stallmo et al. (U.S. Patent No. 5,689,678).

Telephonic Interview

As an initial matter, the Applicants would like to thank Examiner Serrao and Examiner Lu for the telephone interview on Wednesday October 5, 2005. Participating in the telephone call were Jon Gibbons and Thomas Grzesik, attorneys for the Applicants. There were no exhibits used in the telephone interview. The Applicants' representatives discussed the teaching of Sakai and Farnwald as it relates to closed loop bus in a ring network for simultaneous communications. Farnwald is directed to a parallel bus which is not closed loop. Further discussed was the use of Tokens in Farnwald not for "complete roundtrip communications transactions" but rather setup unique device ID numbers. A quick review combining references under a 103 rejection which are inoperable when combined or destroy the intent of one of the references (i.e. parallel bus versus ring networked) was discussed. No agreement was reached on claim language and the parties agreed the Applicants would suggest new language to help

clarify over the cited references.

Overview of the present invention

In a typical business environment, many offices are connected together so that computers, printers, and associated equipment can communicate together. This configuration is known as a LAN (Local Area Network). There are two widely used types of LAN networks: Ethernet Net (IEEE 802.3) and Token Ring (IEEE 802.5). The Ethernet network is more widely used because typically it is less expensive to use. However, if several communication devices contend for communication at the same time, bottlenecks occur during which all devices except one must "Backoff" or hold-off communicating until this one device completes the communication. After this, another device starts communicating until all devices are complete. This is a problem with "simultaneous" communications. In an Ethernet network topology, the aggregated bandwidth of the network cannot approach the incremental bandwidth due to the lack of controlled loading. In contrast to an Ethernet network topology, a Token Ring allows for controlled loading. As the name implies, a Token Ring network is based on token passing for higher shared bandwidth and avoids collisions based on the control of the tokens. Although both are useful, these LAN standards of Ethernet network and Token Ring network are not without their shortcomings. One shortcoming is that both Ethernet and Token Ring networks do not allow for simultaneous communications.

To provide simultaneous communications, the present invention couples at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications. The present invention determines if there is data from at least one of the master agents. If there is data from at least one of the master agents, the data from the bus is tested to determine if it is a token, wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus. In response to the data from the bus being a token, the data is moved from the at least

one of the master agents to the bus and the token is discarded from the bus. In the response to the data not being a token from the bus, the data is moved from the input of the bus to the output of the bus. In response to the data not being from the at least one of the master agents and the data is from the bus, the data is moved from the input of the bus to the output of the bus.

Support for these amendments may be found in the specification as originally filed. See, for example page 6, lines 13-15; page 7, lines 3-5; page 11, page 9, lines 1-6; and the Abstract. No new matter was added by the amendment.

Claim Objections

As noted above, the Examiner objected to claims 1, 9, and 10 due to various informalities. The Applicants have amended claims 1, 9, and 10 and believe that the objection to claims 1, 9, and 10 has been overcome.

Rejection under 35 U.S.C. §103(a) as being unpatentable over Farmwald and Sakai

As noted above, the Examiner rejected claims 1-10, 12, and 14-17 under 35 U.S.C. §103(a) as being unpatentable over Farmwald et al. (U.S. Patent No. 6,185,644) and Sakai et al. (U.S. Patent No. 6,005,869). Specifically, Sakai is silent on (Emphasis Added):

> coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications;
>
> [...]

testing if the data from the closed loop bus is a token, wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus;

[...]

With respect to claims 1 and 17 and similarly claim 9, the Examiner asserts that Sakai teaches:

in response to the data from the bus being a token, then moving the data from the at least one of the master agents to the bus and discarding the token from the bus; and

in response to the data not being a token from the bus, then moving the data from the input of the bus to the output of the bus;

wherein in response to the data not being from the at least one of the master agents and the data is from the bus, then moving the data from the input of the bus to the output of the bus

However, the Applicants have amended claims 1, 17, and similarly claim 9 to more clearly recite:

coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications;

[...]

testing if the data from the closed loop bus is a token, wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus;

[...]

As stated in the previous Response With Amendment dated July 20, 2005, Sakai discloses a communication network including a single master station and a plurality of slave stations. See Sakai at col. 1, lines 5-7. The master station sends out three types of tokens onto a ring shaped bus. The three tokens consist of an asynchronous token, an isochronous token, and a null token. See Sakai at col. 12, lines 1-15. Sakai teaches entering into an initialization state where the master sends out initialization mode packets (IM) onto the ring shaped bus to slave stations on the bus. Each station can connect or disconnect the flow of data through the ring shaped bus by opening or closing a switch within the station. After the master station knows how many slaves there are, it sends out asynchronous token packets to obtain and confirm actual ID addresses for each of the slaves. Each slave checks to see whether the token information coincides with its own information and, if it does, the station generates an asynchronous data packet with actual ID information. Once the token leaves the slave, the slave outputs the data packet onto the ring. When the master receives a token back, it analyzes the token to determine if a data packet is being sent to the master. The master then deletes and discards the received token. The master transmits another token when it receives a previously transmitted token back. This process is continued until all actual IDs are obtained and confirmed.

After the actual IDs are obtained and confirmed, Sakai teaches entering into a steady state to enable isochronous data communication. Sakai teaches that the master sends out an asynchronous token packet when the steady state is entered. Every time a certain time passes after sending out the asynchronous token, the master sends out an

isochronous token. When a slave station receives an isochronous token designated for that slave, it knows that it is authorized to send isochronous data. The slave waits for a DS packet informing this sending slave that the slave which is intended to receive the isochronous data is in a receiving state. The sending slave then sends the isochronous data onto the ring.

In contrast, the presently claimed invention recites "coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications". The Examiner acknowledged on page 3 of the present Office Action that Sakai does not teach simultaneous communications. The present invention further recites "wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus". In fact, Sakai does not teach this, as previously stated in the Response With Amendment dated July 20, 2005. Sakai teaches that initialization mode packets are first sent out on the bus to the slaves before any tokens are sent. The tokens in the initialization state of Sakai are used by the single master to obtain and confirm the actual IDs of the slave agents. Also, Sakai teaches that slaves cannot transfer data onto the ring until it receives a token authorizing it to do so. For example, for a slave in Sakai to be able to output asynchronous or isochronous data onto the ring, the slave has to first receive an asynchronous or isochronous token. See, for example Sakai at col. 4, lines 65-67 to col. 5, lines1-8; col. 15, lines 60-62; and col. 28, lines 5-14.

In the present invention, as illustrated by the hopper car analogy in the Response With Amendment dated July 2, 2005, there can be n-1 tokens on the ring at all times, where n is the number of agents and therefore, there can be n-1 requests/responses on the ring at the same time. In the present invention, all n-1 tokens are initially on the ring simultaneously. A slave does not need to wait to receive a token before generating a response to a master agent's request. See the Specification as originally filed at page 8, lines 1-11. Nowhere does Sakai teach using a token for complete roundtrip

communication transactions so as to avoid deadlock on the closed loop bus.

Therefore, Sakai does not teach, suggest, or anticipate "coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications; ... testing if the data from the closed loop bus is a token, wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus..." as recited for independent claims 1 and 17 and similarly claim 9. Accordingly, claims 1, 9, and 17 distinguish over Sakai for at least these reasons.

With respect to claims 1 and 17, the Examiner correctly acknowledges that Sakai does not teach:

> A method for simultaneous communication over a bus, the method on a first master agent on the bus having an input and an output to the bus, the method on the first master comprising:
>
> coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a bus;
>
> determining if there is data from at least one of the master agents, and if there is data from the at least one of the master agents then performing:
>
> testing if the data from the bus is a token

However, the Examiner goes on to combine Sakai with Farmwald to overcome the deficiencies of Sakai.[1] In particular, the Examiner states that:

> it would have been obvious to one having ordinary skill in the art at the time of the invention to modify Sakai et al. to a method for simultaneous communication over a bus, the method on a first master agent on the bus

[1] The Applicants make no statement as to whether such combination is even proper.

having an input and an output to the bus, the method on the first master comprising: coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a bus: determining if there is data from at least one of the master agents, and if there is data from at least one of the master agents then performing: testing if the data from the bus is a token in order to increase the bandwidth of DRM access.

Farmwald teaches a memory system having a master device and a plurality of memory subsystems including first and second memory subsystems coupled to a first bus. The Examiner directs the Applicants to col. 13, lines 31-53; and col. 14, lines 65 – col. 15, line 7 of Farmwald. However, neither here nor anywhere else does Farmwald teach the presently claimed invention. In fact, col. 13, lines 31-53 merely teaches that each master detects collisions by monitoring lines which it does not drive to see if another master is driving those lines. Col. 14, lines 65- col. 15, line 7 merely teaches that a token can be used to setup unique device ID numbers.

The claim elements of "determining if there is data from at least one of the master agents, and if there is data from the at least one of the master agents then performing: testing if the data from the bus is a token" need to be read in light of each other and should not be dissected. The Applicants respectfully suggest that the Examiner is improperly dissecting the claim and not reading the elements in light of one another. For example, the Examiner is not reading "determining if there is data from at least one of the master agents" in light of "and if there is data from the at least one of the master agents then performing: testing if the data from the bus is a token". The Examiner dissected the claim and asserted that Farmwald taught "determining if there is data from at least one of the master agents" and then asserted that Farmwald taught "and if there is data from the at least one of the master agents then performing: testing if the data from the bus is a token". The citations given by the Examiner reveal two completely unrelated teachings. For example, col. 13, lines 31-53 teach how each master detects collisions. Tokens are never mentioned anywhere in Farmwald's teaching of detecting

collisions. Col. 14, lines 65- col. 15, line 7 teach how tokens can be used to setup unique device ID numbers. These two teachings are completely unrelated.

A proper rejection would have considered the claim element of "determining if there is data from at least one of the master agents, and if there is data from the at least one of the master agents then performing: testing if the data from the bus is a token" as a whole. Assuming arguendo that Farmwald's teaching of each master detecting collisions read on the presently claimed "determining if there is data from at least one of the master agents", in light of detecting collisions, Farmwald would need to teach "and if there is data from the at least one of the master agents then performing: testing if the data from the bus is a token". Farmwald clearly does not teach this. Therefore, the rejection of claims 1 and 17 and similarly claim 9 was improper for the reasons stated above. Furthermore, claims 1 and 17 and similarly claim 9 distinguish over Farmwald for the reasons stated above.

Additionally, as stated above, the Applicants have amended claims 1, 17 and similarly claim 9 to more clearly recite:

> coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications;
>
> [...]
>
> testing if the data from the closed loop bus is a token, wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus;
>
> [...]

Farmwald teaches a parallel bus. See, for example, Farmwald at FIG. 2. The present invention, on the other hand, teaches a "closed loop bus in a ring network for

simultaneous communications". Furthermore, nowhere does Farmwald teach "wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus". In fact, Farmwald only teaches that tokens are used for setting up unique device ID numbers. Accordingly, claims 1, 17, and similarly claim 9 distinguish over Farmwald for at least these reasons as well.

Therefore, Sakai alone or in combination with Farmwald does not teach the presently claimed "coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications...testing if the data from the closed loop bus is a token, wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus..." Accordingly, claims 1, 17, and similarly claim 9 distinguish over Sakai alone or in combination with Farmwald for at least the reasons stated above.

Continuing further, when there is no suggestion or teaching in the prior art for a hub processing unit for "coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications...testing if the data from the closed loop bus is a token, wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus..." the suggestion cannot come from the Applicants' own specification. The Federal Circuit has repeatedly warned against using the Applicant's disclosure as a blueprint to reconstruct the claimed invention out of isolated teachings of the prior art. See MPEP §2143 and Grain Processing Corp. v. American Maize-Products, 840 F.2d 902, 907, 5 USPQ2d 1788 1792 (Fed. Cir. 1988) and In re Fitch, 972 F.2d 160, 12 USPQ2d 1780, 1783-84 (Fed. Cir. 1992).

Moreover, the Federal Circuit has consistently held that when a §103 rejection is based upon a modification of a reference that destroys the intent, purpose or function of the invention disclosed in the reference, such a proposed modification is not proper and the *prima facie* case of obviousness cannot be properly made. See In re Gordon, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

As stated in the Response With Amendment dated July 20, 2005, the intent, purpose and function of Sakai taken alone or in view of Farmwald is a ring shaped communication network with a single master station and a plurality of slave stations. Sakai begins in an initialization state by first sending Initialization mode packets and then sends asynchronous token packets to obtain and confirm actual IDs of slave stations. Sakai then enters into a steady state enabling the transfer of isochronous data. However, the slaves do not transfer data until they receive a token authorizing them to transfer data. Because Farmwald teaches communications over a parallel bus, this combination as suggested by the Examiner destroys the intent and purpose of Sakai's intent of a ring-shaped system. Stated differently, a parallel bus cannot be combined with a ring-shaped topology. In contrast, the intent of the present invention is coupling at least two master agents with at least one slave agent on a bus, wherein n-1 (n is the number or ring agents) tokens can be on the bus at one time to provide simultaneous communications. A token is used for complete roundtrip communication transactions so as to avoid deadlock on the bus. Accordingly, the combination of Sakai and Stallmo results in an inoperable system. Therefore, the Examiner's case of *"Prima Facie Obviousness"* should be withdrawn.

Furthermore, the Federal Circuit stated in McGinley v. Franklin Sports, Inc., (Fed Cir 2001) that if references taken in combination would produce a "seemingly inoperative device," such references teach away from the combination and thus cannot serve as predicates for a prima facie case of obviousness. In re Sponnoble, 405 F.2d 578, 587, 160 USPQ 237, 244 (CCPA 1969) (references teach away from combination if combination produces seemingly inoperative device); see also In re Gordon, 733 F.2d

900, 902, 221 USPQ 1125, 1127 (Fed. Cir. 1984) (inoperable modification teaches away). Here, Sakai teaches a ring shaped topology and Farmwald teaches an incompatible parallel bus. Therefore, the combination of Sakai with Farmwald to produce the presently claimed invention where at least two master agents are coupled to at least one slave agent on closed loop bus in a ring network for simultaneous communications and wherein a token is for complete roundtrip communication transactions so as to avoid deadlock on the bus, would produce an inoperable device. Accordingly, the combination of Sakai and Farmwald is improper.

Independent claims 5, 8, and 16 similarly recite "coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications" and claims 8 and 16 similarly recite "wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus" and therefore, distinguish over Sakai alone and/or in combination with Farmwald as discussed above for claims 1, 9, and 17.

Further regarding claim 5, the Examiner states on page 6 of the present Office Action that Sakai teaches "a method for simultaneous communication over a bus..." However, regarding claims 1 and 17 the Examiner states on page 3 of the present Office Action that Sakai does not teach "a method for simultaneous communication over a bus..." The Applicants agree with the Examiner that Sakai does not teach "a method for simultaneous communication over a bus..." and respectfully point this discrepancy to the Examiner.

For the foregoing reasons, independent claims 1, 5, 8-9, 16, and 17 distinguish over Sakai taken alone or in view of Farmwald. Claims 2-4, 6-7, 10, 12, and 14-15 depend from claims 1, 5, and 9 respectively. Since dependent claims recite all of the limitations of the independent claim, it is believed that claims 2-4, 6-7, 10, 12, and 14-15 are also

distinguishable from Sakai alone or in view of Farmwald as well and the Examiner's rejection should be withdrawn for independent claims 1, 5, 8-9, 16, and 17 and dependent claims 2-4, 6-7, 10, 12, and 14-15, which withdrawal is respectfully requested.

Rejection under 35 U.S.C. §103(a) in view Sakai et al., Farmwald, and Stallmo et al.

As noted above, the Examiner rejected claims 11 and 13 under 35 U.S.C. 103(a) as being unpatentable over Sakai et al. (U.S. Patent No. 6,005,869) and Farmwald et al. (U.S. Patent No. 6,185,644) as applied to claims 9 and 10 above, and further in view of Stallmo et al. (U.S. Patent No. 5,689,678). With respect to Sakai and Farmwald, the above arguments regarding independent claim 9 are applicable here and will not be repeated.

Further, Sakai alone and/or in combination with Farmwald and/or in combination with Stallmo is completely silent on "coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications...testing if the data from the closed loop bus is a token, wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus..." Accordingly, independent claim 9 of the present invention distinguishes over the Sakai, Farmwald, and Stallmo references for at least this reason.

Continuing further, when there is no suggestion or teaching in the prior art for coupling at least one slave agent with at least two master agents including a first master agent and a second master agent on a closed loop bus in a ring network for simultaneous communications...testing if the data from the closed loop bus is a token, wherein the token is used for complete roundtrip communication transactions so as to avoid deadlock on the closed loop bus..." the suggestion cannot come from the Applicants'

own specification. The Federal Circuit has repeatedly warned against using the Applicant's disclosure as a blueprint to reconstruct the claimed invention out of isolated teachings of the prior art. See MPEP §2143 and Grain Processing Corp. v. American Maize-Products, 840 F.2d 902, 907, 5 USPQ2d 1788 1792 (Fed. Cir. 1988) and In re Fitch, 972 F.2d 160, 12 USPQ2d 1780, 1783-84 (Fed. Cir. 1992).

Moreover, the Federal Circuit has consistently held that when a §103 rejection is based upon a modification of a reference that destroys the intent, purpose or function of the invention disclosed in the reference, such a proposed modification is not proper and the *prima facie* case of obviousness cannot be properly made. See In re Gordon, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

Here the intent, purpose and function of Sakai taken alone and/or in view of Farmwald and/or in view of Stallmo is a ring shaped communication network with a single master station and a plurality of slave stations. Sakai begins in an initialization state by first sending Initialization mode packets and then sends asynchronous token packets to obtain and confirm actual IDs of slave stations. Sakai then enters into a steady state enabling the transfer of isochronous data. However, the slaves do not transfer data until they receive a token authorizing them to transfer data. Because Farmwald teaches a parallel bus and Stallmo teaches a point-to-point system (See FIG. 2), this combination as suggested by the Examiner destroys the intent and purpose of Sakai's intent of a ring-shaped system. Stated differently, a parallel bus and a point-to-point topology cannot be combined with a ring-shaped topology. In contrast, the intent of the present invention is coupling at least two master agents with at least one slave agent on a bus, wherein n-1 (n is the number or ring agents) tokens can be on the bus at one time to provide simultaneous communications. A token is used for complete roundtrip communication transactions so as to avoid deadlock on the bus. Accordingly, the combination of Sakai, Farmwald, and Stallmo results in an inoperable system. Therefore, the Examiner's case of *"Prima Facie Obviousness"* should be withdrawn.

Furthermore, the Federal Circuit stated in McGinley v. Franklin Sports, Inc., (Fed Cir 2001) that if references taken in combination would produce a "seemingly inoperative device," such references teach away from the combination and thus cannot serve as predicates for a prima facie case of obviousness. In re Sponnoble, 405 F.2d 578, 587, 160 USPQ 237, 244 (CCPA 1969) (references teach away from combination if combination produces seemingly inoperative device); see also In re Gordon, 733 F.2d 900, 902, 221 USPQ 1125, 1127 (Fed. Cir. 1984) (inoperable modification teaches away). Here, Sakai teaches a ring shaped topology, Farmwald teaches an incompatible parallel bus, and Stallmo teaches an incompatible point-to-point topology. Therefore, the combination of Sakai with Farmwald, and Stallmo to produce the present invention where at least two master agents are coupled to at least one slave agent on closed loop bus in a ring network for simultaneous communications and wherein a token is for complete roundtrip communication transactions so as to avoid deadlock on the bus would produce an inoperable device. Accordingly, the combination of Sakai, Farmwald and Stallmo is improper.

With respect to the Examiner's comments on page 2 of the present Office Action regarding the motivation to combine Sakai with Stallmo in the previous Office Action, the Applicants respectfully disagree. The Examiner argues that the entire system of Stallmo was not suggested to be combined with Sakai and admits that an inoperable system would occur. The Examiner states that only particular suggested limitations would be combined. However, the teachings of Stallmo were focused on a point-to-point topology and whatever limitations suggested to be combined by the Examiner were taught by Stallmo in a point-to-point topology. Stallmo makes no suggestion as to a ring shaped bus as taught by Sakai. Therefore, the Applicants respectfully believe that there is no motivation to combine Stallmo with Sakai.

For the foregoing reasons, independent claim 9 distinguishes over Sakai taken alone an/or in view of Farmwald and/or in view of Stallmo. Claims 11 and 13 depend from claim 9. Since dependent claims recite all of the limitations of the independent claim, it

is believed that claims 11 and 13 are also distinguishable from Sakai taken alone an/or in view of Farmwald and/or in view of Stallmo as well, and the Examiner's rejection should be withdrawn, which withdrawal is respectfully requested.

CONCLUSIONS

The remaining cited references have been reviewed and are not believed to affect the patentability of the claims as previously amended.

In light of the Office Action, Applicants believe these amendments serve a useful clarification purpose, and are desirable for clarification purposes, independent of patentability. Accordingly, Applicants respectfully submit that the claim amendments do not limit the range of any permissible equivalents.

Applicants acknowledge the continuing duty of candor and good faith to the disclosure of information known to be material to the examination of this application. In accordance with 37 CFR §§ 1.56, all such information is dutifully made of record. The foreseeable equivalents of any territory surrendered by amendment is limited to the territory taught by the information of record. No other territory afforded by the doctrine of equivalents is knowingly surrendered and everything else is unforeseeable at the time of this amendment by the Applicants and their attorneys.

Applicants respectfully submit that all of the grounds for rejection stated in the Examiner's Office Action have been overcome, and that all claims in the application are allowable. No new matter has been added. It is believed that the application is now in condition for allowance, which allowance is respectfully requested.

PLEASE, if for any reason the Examiner finds the application other than in condition for allowance, the Examiner is invited to call either of the undersigned attorneys at (561) 989-9811 should the Examiner believe a telephone interview would advance the prosecution of the application.

Respectfully submitted,

Date: October 10, 2005

By: _____
Jon Gibbons
Registration No. 37,333
Attorney for Applicants

FLEIT, KAIN, GIBBONS,
GUTMAN, BONGINI & BIANCO P.L.
One Boca Commerce Center, Suite 111
551 Northwest 77th Street
Boca Raton, FL 33487
Tel. (561) 989-9811
Fax (561) 989-9812

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